



Phone: (212) 885-5350
Fax: (917) 332-3836
Email: AWeigel@BlankRome.com

July 5, 2011

Via Electronic Case Filing System

Honorable Sandra L. Townes
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Moran Towing Corporation v. American Stevedoring Inc., et al.*
E.D.N.Y. Docket No. 11 Civ. 2636 (SLT)
Our Ref.: 660736-00606

Dear Judge Townes:

We represent Plaintiff Moran Towing Corporation ("Moran") in the above captioned action.

This morning we delivered to Chambers via email a proposed *ex parte* order to arrest the Barge NEW YORK. As the order states, as of this date, Defendant American Stevedoring Inc. ("ASI") has failed to post security in any form either for the release of the Barge NEW JERSEY, which is presently in the custody of the United States Marshal, or for Moran to forgo arresting the Barge NEW YORK. Based on the prior consent order entered into by the parties, Moran retained the right at its sole discretion to re-arrest the Barge NEW YORK if ASI failed to provide security. At the request of your Clerk, the proposed order was filed via the ECF system.

At the time the proposed order was filed, the Barge NEW YORK was in the District at the terminal at Red Hook. After the proposed order was filed, however, ASI contracted with another towing company to have the barge removed from the terminal and taken out of the District to Port Newark. Accordingly, it is our view that the Court's consideration of Moran's proposed order re-arresting the Barge NEW YORK is urgently needed to protect Moran's maritime lien on the barge.

Respectfully submitted,

/s/ Alan M. Weigel

Alan M. Weigel

405 Lexington Avenue New York, NY 10174-0208

www.BlankRome.com

California • Delaware • Florida • New Jersey • New York • Ohio • Pennsylvania • Texas • Washington, DC • Hong Kong